



HON. SYLVIA O. HINDS-RADIX
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August 31, 2022

VIA ECF

Honorable Barbara C. Moses
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: Ransom v. Andrews, 21-CV-6343 (JPO) (BCM)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant Correction Officer Andrews, in the above-matter. Defendant writes to respectfully request a thirty day extension of time to submit a proposed protective order for the Court's review and a letter regarding counsel and DOC's efforts to obtain video footage, from September 2, 2022 until October 3, 2022. Defendant further respectfully requests a thirty day extension of time to provide to plaintiff relevant DOC guidelines and protocols, from September 22, 2022 to October 24, 2022. As plaintiff is presently incarcerated, defendant has not been able to ascertain his position on this request.

By way of brief background, plaintiff, *pro se*, moved to compel, *inter alia*, production of certain DOC guidelines or protocols, as well as video footage plaintiff alleged was in possession of DOC. (See ECF No. 40). The Court, on August 23, 2022, granted plaintiff's motion as to producing DOC guidelines or protocols, and further directed defendant to submit a letter regarding efforts made by counsel and DOC to locate and preserve the alleged video footage.

The undersigned is awaiting a response from DOC regarding their efforts to obtain the video, and is in the process of procuring and producing the plaintiff the relevant DOC guidelines and protocols. Further, this case was previously assigned to Victoria Carballo, who was awaiting admission to SDNY and handling the matter under supervision of the undersigned. Ms. Carballo's last day at this office was on August 25, 2022, and it is the understanding of the undersigned that this matter will be re-assigned to another attorney shortly. In light of these efforts and in order to allow the new attorney to provide substantive responses, defendant

requests a thirty day extension of time to submit a proposed protective order and a letter regarding counsel and DOC's efforts to obtain video footage, from September 2, 2022 until October 3, 2022, as well as a thirty day extension of time to provide to plaintiff relevant DOC guidelines and protocols, from September 22, 2022 to October 24, 2022.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch
Senior Counsel

VIA MAIL

Christopher Ransom
DIN# 21A2662
Elmira Correctional Facility
1879 Davis Street,
Elmira, NY 14901

Application GRANTED to the extent that defendant's deadline to submit the proposed protective order and letter is EXTENDED to **September 16, 2022**. The deadline to produce the relevant DOC guidelines and protocols is EXTENDED to **October 24, 2022**. No further extensions of either deadline will be granted absent compelling circumstances. SO ORDERED.



Barbara Moses
United States Magistrate Judge
September 6, 2022